

Keith Gutstein, Esq.
kgutstein@kaufmandolowich.com

Amanda Varrone, Esq.
Amanda.varrone@kaufmandolowich.com

December 9, 2024

VIA ELECTRONIC MAIL

Hon. Ramon E. Reyes, Jr.
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ghelichkhani v. N.Y. College of Traditional Chinese Medicine, et. al.
Docket No.: 23-CV-8629 (RER)(AYS)

Dear Judge Reyes:

As the Court is aware, this office represents Defendants New York College of Traditional Chinese Medicine, Yemeng Chen, Sunny Shen, Susan Su, Megan Haungs, Mona Lee-Yuan, and Kat Zhao (collectively, "Defendants") in the above matter. In accordance with the briefing schedule, we timely served our Motion to Dismiss on Plaintiff on September 10, 2024. This Motion was sent to Plaintiff via mail and email, as well as filed via ECF as per Rule IV.B.3.f.4 of the Individual Rules.

Pursuant to Your Honor's order, Plaintiff's Opposition was due on November 19, 2024, with our Reply due tomorrow, December 10. As Plaintiff has failed to file and serve any apparent papers by the ordered deadline, it is respectfully requested that the motion be deemed unopposed and that the Court render its decision based on the papers before Your Honor. Should Plaintiff offer a late submission, and the Court accepts same, it is respectfully requested that Defendants' time to submit its Reply be extended accordingly.

We thank the Court for its continued courtesies.

Respectfully yours,
Kaufman Dolowich LLP



Keith Gutstein
Amanda Varrone

All Parties, by ECF